

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	Criminal No. 20-181 (PJS/BRT)
)	
v.)	
)	
Plaintiff,)	
)	
BRANDEN MICHAEL WOLFE,)	DEFENDANT'S MOTION TO BE
)	RELEASED TO A HALFWAY
)	HOUSE
Defendant.)	

Branden Wolfe, by and through his attorney, Douglas Olson, hereby respectfully moves the court to order that Mr. Wolfe be conditionally released to a halfway house. He is currently detained at the Sherburne County jail, and has been since June. He has been taking medication for mental health issues since arriving at the jail and that has benefitted him significantly. The government (AUSA Harry Jacobs) and probation/pretrial services (USPO Brad Rupprecht) agree that it would be appropriate to release Mr. Wolfe to a halfway house. Conditions of release should include that Mr. Wolfe continue to take all prescribed medications, and that he obtains and participates in mental health counseling/therapy as a condition of his release.

Defense counsel assumes that Probation/Pretrial Services will put together the standard order setting forth conditions for Mr. Wolfe's release, including addressing the mental health conditions noted above. We also understand that there is a wait for halfway house placement but request that the order be signed so that Mr. Wolfe can be put on the waiting list.

Dated: September 24, 2020

Respectfully submitted,

s/ Douglas Olson

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